

EXHIBIT 3

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4 -----
5 Civil Action No.
6 In re: FLINT WATER CASES 5:16-cv-10444-JEL-MKM
7 (consolidated)
8 Hon. Judith E. Levy
9 -----
10 Mag. Mona K. Majzoub
11

12 STATE OF MICHIGAN
13 IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE
14 -----
15 IN RE FLINT WATER Case No. 17-1086460-NO
16 LITIGATION Hon. Richard B. Yuille
17

18 -----
19 JENNIFER MASON, et al. Case No. 16-106150-NM
20 Hon. Richard B. Yuille
21 Plaintiffs,
22

23 V.
24 LOCKWOOD, ANDREWS & NEWNAM,
25 PC, et al.,
Defendants.

26 -----X
27 HIGHLY CONFIDENTIAL
28 REMOTE VIDEOTAPED DEPOSITION OF DAVID GADIS
29 Thursday, September 10, 2020
30 9:18 a.m. Eastern
31 VOLUME III
32
33 Reported by: Linda S. Kinkade RDR CRR RMR RPR CSR
34 Videographer: Danny Ortega
35

1 testing going on for a lot of different things?

2 MR. GAMBILL: Objection.

3 A. That was -- that was my intent.

4 Q. And do you remember any comments
5 specifically that you made at that February 18, 2015
6 meeting, sir?

7 A. You know, I do remember some comments
8 because they were short, a short introductory of
9 Veolia and, you know, and who we were, and the
10 comments that I made were in reference to the scope of
11 the job that, from my understanding, that we had there
12 in Flint, and that was to look at the water at the
13 plant is -- is what I remember, and that was what I --
14 I think that I told the public or whatever at that
15 public meeting that were -- there were council members
16 there as well. So that's -- that's sort -- that was
17 my -- that was my mantra at that meeting.

18 Q. And as far as the technical information
19 that you talked about that night, sir, was that based
20 upon information provided to you by other people at
21 Veolia?

22 A. Yes, that is correct.

23 Q. And would that be the technical people?

24 A. That is correct.

25 Q. Now, sir, on the occasions when you were

1 actually at Flint, did you drink the water?

2 A. Oh, yes, definitely. I remember -- I
3 remember arriving in Flint, and when I got to, let me
4 call it the municipal building, wherever the mayor was
5 at or whatever, there was a water fountain there, I
6 think, in the front lobby, if my memory serves me
7 correctly, and I drank the water. And we had, you
8 know, pitchers of water.

9 We made jokes about -- everywhere that I go I
10 always talk about, you know, bottled water versus, you
11 know, tap water, and so I definitely wanted the tap
12 water versus bottled water. So they made sure there
13 was tap water in the rooms.

14 Q. Okay. And based upon the information
15 provided to you by the technical people at Veolia,
16 were you comfortable drinking tap water on February
17 18, 2015, sir?

18 A. Without a doubt.

19 Q. Okay. And did you personally believe that,
20 for the wide spectrum of things that are involved with
21 water, that it was safe for you to be drinking tap
22 water that night, sir?

23 A. Yes, I did.

24 Q. Okay. Now, sir, I might be testing your
25 memory here.

C E R T I F I C A T E

I, LINDA S. KINKADE, Registered Diplomate
Reporter, Certified Realtime Reporter, Registered
Merit Reporter, Certified Shorthand Reporter, and
Notary Public, do hereby certify that prior to the
commencement of examination the deponent herein was
duly sworn by me to testify truthfully under penalty
of perjury.

I FURTHER CERTIFY that the foregoing is a true
and accurate transcript of the remote videoconference
proceedings as reported by me stenographically to the
best of my ability.

I FURTHER CERTIFY that I am neither counsel
for nor related to nor employed by any of the parties
to this case and have no interest, financial or
otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my
hand this 23rd day of September, 2020.


